

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN WOLFE and MARGARET
HEKLOWSKI, on behalf of themselves and
similarly situated employees,

Plaintiffs,

v.

TCC WIRELESS, LLC,

Defendant.

:

:

:

:

:

:

:

:

:

1:16-cv-11663

Judge Ronald A. Guzman

Magistrate Judge Maria Valdez

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AGREEMENT FOR CLASS AND COLLECTIVE ACTION CLAIMS**

Jonathan Wolfe (“Wolfe”) and Margaret Heklowski (née Fronek) (“Fronek”) (collectively “Named Plaintiffs”), on behalf of themselves and the collective they represent under Section 16(b) of the Fair Labor Standards Act, and Fronek, on behalf of herself and the Class of similarly-situated employees she represents under Fed. R. Civ. P. 23, move this Court for Preliminary Approval of the Proposed Settlement with Defendant TCC Wireless, LLC (“Defendant”). In support of this Motion, Plaintiffs submit a Supporting Memorandum of Law. Defendant supports this motion.

Date: November 22, 2017

Respectfully submitted,

s/Douglas M. Werman

One of the Attorneys for Plaintiff

Douglas M. Werman - dwerman@flsalaw.com
Maureen A. Salas - msalas@flsalaw.com
Zachary C. Flowerree – zflowerree@flsalaw.com
Sarah J. Arendt - sarendt@flsalaw.com
Werman Salas P.C.
77 W. Washington, Suite 1402
Chicago, IL 60602
(312) 419-1008

Peter Winebrake
R. Andrew Santillo
WINEBRAKE & SANTILLO, LLC
715 Twining Road, Suite 211
Dresher, PA 19025
(215) 884-2491